

PHOTO PROCESSING WASTE CHECKLIST

Facility Name: _____

Address: _____

City: _____ **Zip Code:** _____

Generator Status (circle one): CESQG; SQG; LQG **EPA ID#:** _____

Facility Contact/Title: _____

Telephone Number: _____ **Fax:** _____

Inspector: _____ **Inspection Date:** _____

1. What types of photographic waste does the facility generate (i.e. sludge, developer, fixer, plate developer)?

2. Did the generator determine if its photo processing waste is hazardous? Yes___ No___
3. Does the generator count the hazardous photo processing waste each month when determining its generator status? Yes___ No___
4. Does the generator have an EPA ID number? Yes___ No___
5. Does the generator send/manifest the photographic waste to a TSDF? Yes___ No___
6. Does the generator send/manifest the photographic waste directly to a recycling/reclamation facility? Yes___ No___
7. Does the SQG or LQG prepare a manifest before transporting or offering the photo processing waste for transport? Yes___ No___
8. Did the SQG that did not use a manifest, have a written agreement with a reclaimer, which states the types and frequencies of shipments? Yes___ No___
9. Does the generator that stores photo processing waste on-site comply with the record keeping requirements of 40 C.F.R. 266.70(c)? Yes___ No___
10. Does the facility train its employees on how to properly handle hazardous photo processing waste? Yes___ No___

PHOTO PROCESSING WASTE MANAGEMENT

Photo processors typically generate waste developer solution, cartridges and fixer solution. Waste developer solution is usually non-hazardous, but there is a material called “plate developer”, which has been found to be hazardous. Cartridges contain silver sludge, which qualifies for a RCRA exemption under 40 C.F.R. 261.2(c)3. The USEPA has determined that the waste material in the cartridge is a “sludge exhibiting a characteristic of hazardous waste”, which is not solid waste if destined for reclamation. If the sludge is sent for disposal, RCRA hazardous waste requirements apply. Waste fixer solution typically contains hazardous quantities of silver. The USEPA has determined that the waste solution is a “spent material” as defined at 40 C.F.R. 261.1(c)1. Spent materials sent for reclamation are solid waste, and hazardous waste if they meet the definition in 40 C.F.R. 261.3. The waste fixer solution is eligible for several RCRA exemptions if it contains economically significant amounts of precious metals. If the spent fixer solution is sent to a TSDF, RCRA hazardous waste requirements apply.

Generators must count all hazardous wastes generated on-site each month to determine the facility’s generator status (CESQG, SQG or LQG). Photo processing waste meeting the definition of hazardous waste must be counted when determining the facility’s generator status. The sludge contained in the cartridges is not counted if it is destined for reclamation. If the sludge is destined for disposal, it is subject to RCRA hazardous waste requirements, and must be counted. Hazardous waste fixer solution stored on-site prior to reclamation must be counted. If the hazardous waste fixer solution is directly reclaimed on-site, without prior storage, it is not counted.

Generators of photo processing waste must be in compliance with all RCRA regulations applicable to their generator status. However, there are reduced regulatory requirements with respect to wastes destined for reclamation and recovery. The sludge contained in a cartridge is not RCRA regulated, unless it is sent for disposal. Waste fixer solution sent for disposal is subject to full RCRA hazardous waste requirements. Waste fixer solution sent for recycling/reclamation is considered a recyclable material and is not subject to the general RCRA Subtitle C requirements. It states in 40 C.F.R. 261.6(a)2iii that recyclable materials from which precious metals are reclaimed are regulated under 40 C.F.R. 266.70 (Subpart F). However, the regulations under Subpart F only apply if the waste contains economically significant quantities of precious metals.

SQGs and LQGs that generate waste subject to Subpart F are responsible to comply with the notification requirements at 3010 of RCRA, and obtain an EPA Identification number. They are also responsible to comply with Subpart B of 40 C.F.R. 262 (Manifests). SQGs that have an agreement with a waste reclaimer do not need to use a manifest. The agreement must state the types and frequencies of shipments, and the generator must maintain the agreement on-site. SQGs and LQGs of waste subject to Subpart F are also responsible to comply with the record keeping requirements of 40 C.F.R. 266.70(c).